

**UNITED STATES FEDERAL COURT  
SOUTHERN DISTRICT OF NEW YORK**

RODNEY JONES,

Plaintiff,

v.

SEAN COMBS,  
JUSTIN DIOR COMBS  
CUBA GOODING JR.,  
LUCIAN CHARLES GRAINGE,  
KRISTINA KHORRAM,  
LOVE RECORDS,  
MOTOWN RECORDS,  
UNIVERSAL MUSIC GROUP,  
COMBS GLOBAL ENTERPRISES,  
JOHN and JANE DOES 1-10 and  
ABC CORPORATIONS. 1-10

Defendants.

Case Number: 24-1457

**Declaration of Tyrone A. Blackburn In  
Support of Plaintiff's Motion For Dismissal  
Of All Claims and Allegations Against Lucian  
Charles Grainge, Motown Records and UMG  
Recordings, Inc. (Incorrectly named as  
Universal Music Group**

I, Tyrone A. Blackburn, declare as follows:

1. I am the principal of Tyrone A. Blackburn Law, PLLC. I am counsel in this case for the Plaintiff, Rodney Jones. I have personal knowledge of the facts set forth in this Declaration and if called and sworn as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of the Plaintiff's motion, pursuant to Rules 15, 21 and 41 of the Federal Rules of Civil Procedure, for the dismissal with prejudice of all claims made in the Second Amended Complaint against Lucian Charles Grainge, Motown Records and Universal Music Group (which I am advised was incorrectly named in the Second Amended Complaint and is properly named as UMG Recordings, Inc.), to amend the Second Amended Complaint solely to the extent of deleting therefrom all references to and allegations made against

Mr. Grainge, Motown Records and Universal Music Group/UMG Recordings, Inc. (collectively the “UMG Defendants”) and amending the caption to remove them therefrom.

3. The UMG Defendants have made two motions to dismiss, first directed against the First Amended Complaint and then against the Second Amended Complaint. Based on my examination of all of the papers submitted in support of both motions to dismiss, which addressed the issues I had, I have concluded that there is no legal basis for the claims and allegations that were made against the UMG Defendants. As such, I have determined that the proper course of action is for all of the claims and all of the allegations to be withdrawn immediately and the Second Amended Complaint as against the UMG Defendants be dismissed with prejudice. And to accomplish the striking of all references to the UMG Defendants in the Second Amended Complaint, I respectfully request that the Second Amended Complaint be deemed amended to delete therefrom any and all references to the UMG Defendants.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated May 13, 2024

*Tyrone A. Blackburn, Esq.*  
Tyrone A. Blackburn